

Debtor 1 Lisa M. Williams

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA
(State)

Case number 20-11627-pmm

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: U.S. Bank Trust National Association, as Trustee of LB-Cabana Series IV Trust **Court claim no. (if known):**
4-1

Last 4 digits of any number you use to identify the debtor's account: 6343

Property address: 5617 1/2 North Palethorp Street
Number Street

Philadelphia PA 19120
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: ____/____/_____
MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 0.00
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ 1,256.29*
- c. **Total.** Add lines a and b. (c) \$ 1,256.29

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

03 / 01 / 2025
MM / DD / YYYY

* PPFN Fees and Costs

Debtor 1 Lisa M. Williams Case number (if known) 20-11627-pmm
First Name Middle Name Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/Lauren Moyer
Signature

Date 03 / 03 / 2025

Print Lauren Moyer
First Name Middle Name Last Name

Title Creditor's Attorney

Company Friedman Vartolo LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 1325 Franklin Avenue, Suite 160
Number Street

Garden City NY 11530
City State ZIP Code

Contact phone (212) 471 - 5100

Email bankruptcy@friedmanvartolo.com

Date rec'd	Days	Date Due/ Description	Total Pd.	Case 20-11627-pmm Doc	Filed 03/03/25	Entered 03/03/25 18:34:56	Desc	Main	APO	Late Chg							
				Amount Posted	Mo Acc Int.	Cum Acc Int.	Interest	Principal	Page 4 of 8 Balance	Escrow pmt/ Disb	Arrearage pmt/ Disb	APO Balance	APO Claim / PMT	Late Chg Bal	Late Chg Pmt/ Disb	Suspense	Prin. Bal.
10/25/21	30	10/01/21	730.00	474.59	311.07	311.07	311.07	163.52	(5,320.86)	230.86	(14289.87)	0.00	0.00	0.00	0.00	29.40	52,228.01
11/19/21		Arrears Payment	1,305.43	0.00	0.00	0.00	0.00	0.00	(5,320.86)	0.00	(12984.44)	1305.43	0.00	0.00	0.00	29.40	52,228.01
12/01/21	30	11/01/21	730.00	474.59	310.10	310.10	310.10	164.49	(5,090.00)	230.86	(12984.44)	0.00	0.00	0.00	0.00	53.95	52,063.52
12/31/21	30	12/01/21	730.00	474.59	309.13	309.13	309.13	165.46	(4,851.33)	238.67	(12984.44)	0.00	0.00	0.00	0.00	70.69	51,898.06
01/17/22		Late Charge Assess	0.00	0.00	0.00	0.00	0.00	0.00	(4,851.33)	0.00	(12984.44)	0.00	0.00	0.00	(18.98)	70.69	51,898.06
01/21/22		Arrears Payment	326.36	0.00	0.00	0.00	0.00	0.00	(4,851.33)	0.00	(12658.08)	326.36	0.00	0.00	0.00	70.69	51,898.06
02/01/22	30	01/01/22	730.00	474.59	308.14	308.14	308.14	166.45	(4,612.66)	238.67	(12658.08)	0.00	0.00	0.00	0.00	87.43	51,731.61
02/16/22		Arrears Payment	326.35	0.00	0.00	0.00	0.00	0.00	(4,612.66)	0.00	(12331.73)	326.35	0.00	0.00	0.00	87.43	51,731.61
02/17/22		Late Charge Assess	0.00	0.00	0.00	0.00	0.00	0.00	(4,612.66)	0.00	(12331.73)	0.00	0.00	0.00	(37.96)	87.43	51,731.61
02/25/22		Tax Disbursal	0.00	0.00	0.00	0.00	0.00	0.00	(5,914.47)	(1,301.81)	(12331.73)	0.00	0.00	0.00	0.00	87.43	51,731.61
03/17/22		Late Charge Assess	0.00	0.00	0.00	0.00	0.00	0.00	(5,914.47)	0.00	(12331.73)	0.00	0.00	0.00	(56.94)	87.43	51,731.61
03/18/22		Arrears Payment	326.36	0.00	0.00	0.00	0.00	0.00	(5,914.47)	0.00	(12005.37)	326.36	0.00	0.00	0.00	87.43	51,731.61
04/17/22		Late Charge Assess	0.00	0.00	0.00	0.00	0.00	0.00	(5,914.47)	0.00	(12005.37)	0.00	0.00	0.00	(75.92)	87.43	51,731.61
05/16/22	30	02/01/22	2,190.00	474.59	307.16	307.16	307.16	167.43	(5,675.80)	238.67	(12005.37)	0.00	0.00	0.00	0.00	1,564.17	51,564.18
	30	03/01/22	0.00	474.59	306.16	306.16	306.16	168.43	(5,437.13)	238.67	(12005.37)	0.00	0.00	0.00	0.00	850.91	51,395.75
	30	04/01/22	0.00	474.59	305.16	305.16	305.16	169.43	(5,198.46)	238.67	(12005.37)	0.00	0.00	0.00	0.00	137.65	51,226.32
06/17/22		Late Charge Assess	0.00	0.00	0.00	0.00	0.00	0.00	(5,198.46)	0.00	(12005.37)	0.00	0.00	0.00	(94.90)	137.65	51,226.32
06/27/22		Arrears Payment	1,305.43	0.00	0.00	0.00	0.00	0.00	(5,198.46)	0.00	(10699.94)	1305.43	0.00	0.00	0.00	137.65	51,226.32
07/08/22		Insurance Disbursal	0.00	0.00	0.00	0.00	0.00	0.00	(7,105.69)	(1,907.23)	(10699.94)	0.00	0.00	0.00	0.00	137.65	51,226.32
7/17/22		Late Charge Assess	0.00	0.00	0.00	0.00	0.00	0.00	(7,105.69)	0.00	(10699.94)	0.00	0.00	0.00	(113.88)	137.65	51,226.32
07/19/22	30	05/01/22	730.00	474.													

				Case 20-11627-bmm Doc Filed 03/03/25 Entered 03/03/25 18:34:56 Desc Main APO Claim / PMT Late Chg Pmt/ Disb Suspense Prin. Bal.															
Date rec'd	Days	Date Due/ Description	Total Pd.	Amount Posted	Mo Acc Int.	Cum Acc Int.	Interest	Principal	Balance	Escrow pmt/ Disb	Arrearages	Arrearage pmt/ Disb	APO Balance	APO Claim / PMT	Late Chg Bal	Late Chg Pmt/ Disb	Suspense	Prin. Bal.	
03/24/23		RELIEF GRANTED	0.00	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	(265.72)	0.00	960.81	49,655.49	
03/29/23		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	(265.72)	0.00	1,690.81	49,655.49	
04/17/23		Late Charge Assess	0.00	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	(284.70)	(18.98)	1,690.81	49,655.49	
04/21/23		Late Charge Payment	0.00	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	284.70	1,406.11	49,655.49	
04/21/23		Legal Fee Payment	(402.40)	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	1,003.71	49,655.49	
04/21/23		PS Corp Advance Payment	(273.71)	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	730.00	49,655.49	
04/25/23		BK Funds to Suspense	666.74	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	1,396.74	49,655.49	
05/01/23		Funds Returned to Borrower	(730.00)	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	666.74	49,655.49	
05/01/23		Funds Returned to Trustee	(666.74)	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	0.00	49,655.49	
05/08/23		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	730.00	49,655.49	
05/31/23		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	1,460.00	49,655.49	
06/08/23		Funds Returned to Borrower	(1,460.00)	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	0.00	49,655.49	
06/30/23		BK Funds to Suspense	666.74	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	666.74	49,655.49	
07/05/23		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	1,396.74	49,655.49	
08/24/23		BK Funds to Suspense	666.74	0.00	0.00	0.00	0.00	0.00	(7,288.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	2,063.48	49,655.49	
08/25/23		Insurance Disbursal	0.00	0.00	0.00	0.00	0.00	0.00	(8,826.22)	(1,538.00)	(7997.90)	0.00	0.00	0.00	0.00	0.00	2,063.48	49,655.49	
08/28/23		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	2,793.48	49,655.49	
09/26/23		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	3,523.48	49,655.49	
09/27/23		BK Funds to Suspense	333.37	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	3,856.85	49,655.49	
10/19/23		BK Funds to Suspense	333.37	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	4,190.22	49,655.49	
10/24/23		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	4,920.22	49,655.49	
11/22/23		BK Funds to Suspense	326.12	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	5,246.34	49,655.49	
11/24/23		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	5,976.34	49,655.49	
12/31/23		BK Funds to Suspense	326.13	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	6,302.47	49,655.49	
01/02/24		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	7,032.47	49,655.49	
01/19/24		Funds Returned to Borrower	(4,380.00)	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	2,652.47	49,655.49	
01/22/24		Funds Returned to Trustee	(2,652.47)	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	0.00	49,655.49	
01/25/24		BK Funds to Suspense	326.12	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	326.12	49,655.49	
01/29/24		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(8,826.22)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	1,056.12	49,655.49	
02/20/24		Tax Disbursal	0.00	0.00	0.00	0.00	0.00	0.00	(11,214.28)	(2,388.06)	(7997.90)	0.00	0.00	0.00	0.00	0.00	1,056.12	49,655.49	
02/27/24		BK Funds to Suspense	326.12	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	1,382.24	49,655.49	
02/29/24		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	2,112.24	49,655.49	
03/04/24		Funds Returned to Borrower	(730.00)	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	1,382.24	49,655.49	
03/12/24		Funds Mistakenly Posted to this Loan	5,463.88	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	6,846.12	49,655.49	
03/13/24		Funds Returned to Trustee	(652.24)	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	6,193.88	49,655.49	
03/14/24		Funds Returned to Borrower	(730.00)	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7997.90)	0.00	0.00	0.00	0.00	0.00	5,463.88	49,655.49	
03/22/24		Arrears Payment	326.12	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7671.78)	326.12	0.00	0.00	0.00	0.00	5,463.88	49,655.49	
03/26/24		Funds Mistakenly Returned to this Borrower	(5,463.88)	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7671.78)	0.00	0.00	0.00	0.00	0.00	0.00	49,655.49	
03/26/24		Borrower PMT to Suspense	730.00	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7671.78)	0.00	0.00	0.00	0.00	0.00	730.00	49,655.49	
04/29/24		Arrears Payment	326.12	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7345.66)	326.12	0.00	0.00	0.00	0.00	730.00	49,655.49	
05/02/24		Borrower PMT to Suspense	14,320.00	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7345.66)	0.00	0.00	0.00	0.00	0.00	15,050.00	49,655.49	
05/02/24		Remove Funds that were Mistakenly Returned to this Borrower	(5,463.88)	0.00	0.00	0.00	0.00	0.00	(11,214.28)	0.00	(7345.66)	0.00	0.00	0.00	0.00	0.00	9,586.12	49,655.49	

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Lisa M. Williams
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association, as Trustee of LB-Cabana
Series IV Trust
v.

Lisa M. Williams
Kenneth E. West
Respondents

CASE NO.: 20-11627-pmm

CHAPTER 13

Judge: Patricia M. Mayer

Hearing Date:

Objection Deadline:

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I caused to be served the above-captioned pleading on the parties at the addresses specified below or on the attached list on March 3, 2025.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail are listed under the heading "Service by First-Class Mail."

EXECUTED ON: March 3, 2025

By: /s/ Lauren Moyer

Lauren Moyer, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for SN Servicing Corporation as servicer
for U.S. Bank Trust National Association, as
Trustee of LB-Cabana Series IV Trust
1325 Franklin Avenue, Suite 160

Garden City, NY 11530

T: (212) 471-5100

F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

Service by Regular Mail

Lisa M. Williams
6439 N. 15th Street
Philadelphia, PA 19126
Bankruptcy Debtor

Service by NEF

Kenneth E. West
190 N. Independence Mall West, Suite 701
Philadelphia, PA 19106
Bankruptcy Trustee

Michael A. Cibik
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
Attorney

United States Trustee
Robert N.C. Nix Federal Building - Suite 320, 900 Market Street
Philadelphia, PA 19107
United States Trustee